

**Before the
FEDERAL COMMUNICATIONS COMMISSION
445 12th Street, SW
Washington, D.C. 20554**

CPNI CERTIFICATION OF EPM TELECOMUNICACIONES S.A. E.S.P.

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: March 2, 2009

FCC Registration Number: 0015342777

Name of signatory: Horacio Vélez de Bedout

Title of signatory: President

I, Horacio Velez de Bedout, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: _____

Handwritten signature

ATTACHMENT TO

2008 CPNI CERTIFICATION OF EPM TELECOMUNICACIONES S.A. E.S.P.

The operating procedures of EPM Telecomunicaciones S.A. E.S.P. ("EPM TELCO") ensure compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules (hereinafter "CPNI rules"). EPM TELCO only offers one category of telecommunications service—international carrier's carrier service—and therefore, any use, disclosure or access to its customers' CPNI falls within 47 C.F.R. § 64.2005(a). This rule permits EPM TELCO to use, disclose or permit access to CPNI for the purpose of providing or marketing its wholesale transport service without customer approval.

Moreover, EPM TELCO takes several steps to find out and protect against attempts to gain unauthorized access to its customers' CPNI, as well as properly authenticate its customers prior to disclosure to customers. First, EPM TELCO enters into a non-disclosure agreement with new customers that commits EPM TELCO to protect from unauthorized use or disclosure all records or information in written, oral, graphic, machine-readable or electronic format relating to its carrier-customer's customers, services or products, as well as any other information reasonably understood as confidential. EPM TELCO may use the information for purposes of negotiating a master services agreement ("MSA") with the customer, and may disclose, on a need-to-know basis, the information to agents and independent contractors who are bound to protect the information from unauthorized use and disclosure under a written agreement. The MSA requires EPM TELCO to protect the confidential information of its customers except upon receipt of customer consent or as is required by law. The MSA specifically provides that any personal data, such as contact information, may only be processed or

transferred for purposes of fulfilling the terms of the agreement or otherwise providing the service. Any disclosures of CPNI to EPM TELCO's customers are only made to the customer's dedicated account representative. Moreover, the only non-aggregate information pertaining to the transmission of specific telephone calls to which EPM TELCO has access in connection with its carrier's carrier services is limited to the called number and duration, and this is not associated with the name, address or other identifying information of any ultimate end user. Regardless, EPM TELCO would only disclose such information to its customer's designated representative. Finally, EPM TELCO carrier-customer information is not available online or in a store-front, which further reduces the risk of unauthorized disclosure.

EPM TELCO does not disclose CPNI to any third parties, as it handles billing and operational functions itself, and EPM TELCO does not use CPNI to market its services. Internally, EPM TELCO limits the number of employees authorized to access CPNI. These employees access the information only for purposes of, and to the extent necessary, to provide the service, render bills and handle any related legal issues. Employees with access to CPNI are made aware, and have knowledge, of the proper handling and use of this information, which is not only protected under the CPNI rules, but is also commercially-sensitive information that EPM TELCO carefully guards for its own business interests. All EPM TELCO's employees are bound by an employment contract with EPM TELCO that provides for confidentiality and, among other duties, obligates employees not to disclose, except as necessary in carrying out duties for EPM TELCO, any information related to EPM TELCO's proprietary information, data or trade secrets, including, but not limited to customer lists and customers information, finances or other business information disclosed to employee either directly or indirectly in writing or

orally. Any employee using, disclosing, or providing access to CPNI for any other purpose would be subject to discipline, including potential dismissal.